

## Affidavit of Johnell Turner 18cv10834

I, Johnell Turner, do hereby affirm that the following is true and accurate to the best of my knowledge, information and belief on this 10th day of March, 2019:

USDC SDNY  
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1. My name is Johnell Turner.  
2. I am an inmate at MDC Brooklyn and my federal registration number is 78236-054.

3. Mr. Martin S. Gottesfeld (Federal registration number 12982-104) has been my cellmate in the West Special Housing Unit (SHU) of MDC Brooklyn since the night of February 15th, 2019.

4. On the night of February 15th, 2019, prior to me meeting Mr. Gottesfeld for the very first time, Officer-In-Charge K. LeCant informed me that I would be getting a new cellmate later that night, who turned out to be Mr. Gottesfeld, and that my new cellmate is "an activist." Mr. LeCant whispered to me regarding Mr. Gottesfeld's situation, "It's political."

5. MDC Brooklyn never advised me, nor to my knowledge any other inmate, of the importance of fluoride in toothpaste nor that I was being issued toothpaste without fluoride, i.e. Oraline 1.4oz (39.7g) "Fresh Mint Flavor Toothpaste." I remained unaware of these facts until told so by Mr. Gottesfeld on February 15th, 2019.

6. Inmates in the SHU at MDC Brooklyn are not provided with any dental-flourishing products nor mouthwash.

7. The head of medical at MDC Brooklyn, Mr. Travers, often tells inmates in the SHU that they will not receive routine medical care, as he did on the morning of Wednesday, February 20th, 2019. Mr. Travers does not differentiate between inmates in administrative segregation and disciplinary segregation nor based on potential risks to staff when he makes such statements.

8. The head of medical at MDC Brooklyn, Mr. Travers, told an inmate on the morning of Wednesday, February 27th, 2019, that SHU inmates do not receive "routine dental care." Once again, Mr. Travers did not differentiate between administratively-segregated inmates and those on disciplinary segregation or based on any risk factors.

9. Mr. Travers does his weekly rounds through the West SHU in the same group as the warden, Mr. H. Quay. It is more likely than not that Mr. Quay has heard Mr. Travers telling SHU inmates that they are denied routine medical and dental care.

10. On the morning of Wednesday, February 27th, 2019, I heard both sides of the conversation when Mr. Gottesfeld spoke with Warden Quay regarding his situation in the SHU. Mr. Gottesfeld told Mr. Quay that he had been told he was in the SHU pending a "captain's review," but that it had been over a week and he had not yet spoken to any captain, that he had not requested protective custody, had never been charged with a BOP infraction, ~~had not received an administrative detention order~~, had not been to any administrative detention hearing, had not received any administrative detention order, and that he was in the SHU against his wishes. Mr. Quay told Mr. Gottesfeld that he would be in the SHU for the rest of his stay at MDC Brooklyn because, "We have security concerns."

11. I witnessed Mr. Gottesfeld submit multiple written requests to see a dentist on and after Thursday, February 28th, 2019.

12. On the morning of Wednesday, March 6th, 2019, I heard both sides of the conversation as Mr. Gottesfeld spoke to the head of medical, Mr. Travers, regarding his wisdom tooth. Mr. Gottesfeld told Mr. Travers that the situation was an emergency as it was affecting his ability to eat. Mr. Travers responded by telling Mr. Gottesfeld, "There's no such thing as a dental emergency," but that he would tell dental that Mr. Gottesfeld was looking for them.

13. Inmates in the SHU have no access to the BOP's electronic messaging system but inmates in general population do.

14. On Saturday, March 9th, 2019, Mr. Gottesfeld was taken by staff to use the electronic law library, which is a networked computer service. Mr. Gottesfeld was gone for roughly 40 minutes.

15. Mental health personnel at MDC Brooklyn do not make daily rounds through the West SHU.

16. SHU inmates at MDC Brooklyn are not allowed contact visits with family members.

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[per month] 17. Federal inmates in general population are allowed up to 300 minutes of phone calls and can make calls throughout the day. SHU inmates are allowed only a single social phone call per month of up to 15 minutes.

18. Federal inmates in general population can use electronic messaging throughout the day but SHU inmates cannot use this system at all.

19. Under normal circumstances, SHU inmates at MDC Brooklyn can order only 20 one-ounce Forever U.S. postage stamps every 2 weeks.

Signed under penalty of perjury,

Johnell Turner

Johnell Turner, Reg. No.: 78236-054